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Attorneys for Plaintiff and Defendant,
OPULENT TREASURES, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

OPULENT TREASURES, INC.,
Plaintiff,

v.

YA YA CREATIONS, INC., BALSA
CIRCLE, LLC, et al.
Defendants.

Case No. 2:22-cv-02616-SSS-JC

***Consolidated with Case No. 2:22-cv-6137
and Case No. 2:23-cv-04292***

YA YA CREATIONS, INC.,
Plaintiff,
v.

OPULENT TREASURES, INC.,
Defendant.

Case No. 2:22-cv-6137-SSS-JC

***Consolidated with Case No. 2:22-cv-02616
and Case No. 2:23-cv-04292***

OPULENT TREASURES, INC.,
Plaintiff,

v.

YA YA LOGISTICS, INC., et al.
Defendants.

Case No. 2:23-cv-04292-SSS-JC

***Consolidated with Case No. 2:22-cv-02616
and Case No. 2:22-cv-6137***

**DECLARATION OF CAROL WILSON
IN SUPPORT OF OPULENT
TREASURES, INC.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Judge: Hon. Sunshine S. Sykes
Hearing Date: August 1, 2025
Time: 2:00pm
Courtroom: 2 (Zoom videoconference)

DECLARATION OF CAROL WILSON

I, Carol Wilson, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein. If called as a witness, I could and would testify to the statements made herein.

2. I am the CEO and founder of Opulent Treasures, Inc., Plaintiff and Counter-Defendant in this matter (“Opulent”). I am knowledgeable about or have access to business records concerning key aspects of Plaintiff’s brand protection operation, including, but not limited to, copyrights, trademarks, other intellectual property, sales, on-line sales, advertising, marketing, media coverage, and associated international operations relating to Opulent’s products.

3. Currently, and from the foundation of the company in late 1995, Opulent specializes and has specialized in the development, designing, distributing and marketing of elegantly and uniquely crafted entertainment and home décor pieces. In particular, Opulent is the creator of the “Chandelier Cake Stand,” “Chandelier Cupcake Holder,” “Chandelier Candle Holder” and many other distinct designs (“Opulent Designs”). Opulent’s goal has been to add charm, elegance, and stunning beauty to each customer’s special occasions and celebrations. The Opulent Designs have become popular with consumers and gained mainstream significance, driven by Opulent’s arduous quality standards and innovative design.

4. Opulent owns the exclusive rights in eight copyrighted designs (the “Opulent Copyrights”). The Opulent Copyrights have been registered with the United States Copyright Office, under the following copyright registrations: VA 2-298-980 for its Round Cake Stand, VA 2-299-360 for its Chandelier Cupcake Cake/Cupcake/Desert Stand, VA 2-299-364 for its Chandelier Cupcake Stand, VA 2-299-366 for its 3 Tier Chandelier Dessert Stand, VA 2-304-222 for its Set of 3 Square Chandelier Dessert Stand, VA 2-308-419 for its Round Cake Stand with Crystals, VA 2-309-157 for its Moroccan Jeweled Cake Stand Set, and VA 2-315-469 for its Blossom Display Arrangement. Opulent Copyrights are depicted below:



5. Attached hereto as **Exhibit A** are the copyright registrations for the

1 Opulent Copyrights. Opulent believes, and at all relevant times has believed, that
2 these copyright registrations are valid, subsisting, and in full force and effect.

3 6. Opulent conceived, designed, invented, caused to subsist in material
4 form and first published the original Opulent Designs in August 2006. Shortly
5 thereafter, Plaintiff began to commercialize products and immediately attracted
6 substantial international media attention and success. First serving specialty stores,
7 boutiques, and event planners, Opulent has grown into a multi-million dollar
8 business, shipping up to 40,000 pieces per month, with a sales revenue of
9 approximately \$3 million annually. Today, Opulent products are sold across the
10 globe via online sales channels, including e-commerce platforms such as Wayfair,
11 Houzz, Amazon, and QVC, and through Opulent's own website at
12 www.opulenttreasures.com, as well as via large brick-and-mortar retailers, such as
13 Home Goods, TJMaxx, Marshalls, Winners, Home Sense and TKMaxx Europe all
14 fall under The TXJ Companies, INC.

15 7. Opulent has earned an international reputation for quality, reliability,
16 and value and is credited for a high-quality and innovative product designs in
17 relation to its products bearing the unique and distinctive Opulent Designs. Opulent
18 has also earned an international reputation for its products. Opulent is the official
19 source of Opulent Designs products in the United States.

20 8. In addition to their quality, reliability, and value, Opulent's products
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1 are also known and sought after for their distinctive artwork and designs. These
2 artwork and designs are broadly recognized by consumers as being sourced from
3 Opulent. Products fashioned after these artwork and designs are associated with the
4 quality and innovation that the public has come to expect from Opulent's brand.
5 Opulent uses these original artwork and designs, including the Opulent Copyrights,
6 in connection with its products.
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9 9. Since at least 1995, the Opulent Designs are and have been the subject
10 of substantial and continuous marketing and promotion by Opulent.

11
12 10. Ya Ya Creations, Inc. is a competing home décor company that sells its
13 products exclusively online.

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15 11. The success of the Opulent's brand and products has resulted in
16 significant counterfeiting. Consequently, Opulent has implemented an anti-
17 counterfeiting program and is investigating suspicious websites and online
18 marketplace listings identified in proactive Internet sweeps as part of that program.

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20 12. Opulent has identified numerous domain names linked to fully
21 interactive websites and online marketplace platforms, such as Amazon.com,
22 eBay.com, etsy.com, Pinterest.com, Walmart.com, and Wish.com.

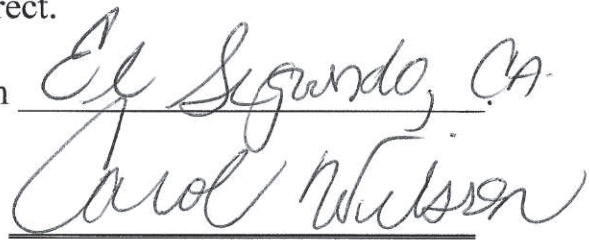
23
24 13. Through Opulent's investigation, it learned of Ya Ya Creations, Inc.'s
25 sale of products on the fully interactive websites and online marketplace platforms
26 that appear substantially similar to the Opulent Designs and bear the Opulent
27

1 Copyrights, but which are actually inferior and unauthorized imitations of the
2 Opulent's products.

3 14. Opulent issued takedown notices to these online marketplace platforms
4 in a good faith effort to enforce the Opulent Copyrights pursuant to the Digital
5 Millennium Copyright Act ("DMCA").
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7 I declare under penalty of perjury under the laws of the United States of
8 America the foregoing is true and correct.
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10 Executed on March 6th 2024 in El Segundo, CA

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12 Carol Wilson
13 Carol Wilson
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